

PERMIT NO. 3714-031-0065-S-01-0
ISSUANCE DATE:



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Ecoplastic America Corp.
Facility Address: 4822 US Hwy 301
Statesboro, Georgia 30452 Bulloch County
Mailing Address: 4185A Silver Peak Pkwy
Suwanee, GA 30024
Facility AIRS Number: 04-13-031-00065

is issued a Permit for the following:

The construction and operation of a plastic automobile part manufacturing facility

This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28635 dated November 25, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **10** pages.



Richard E. Dunn, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution, and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not discharge, or cause the discharge into the atmosphere, from the entire facility (except natural gas combustion and plastic injection molding process), volatile organic compounds (VOC) in an amount equal to or exceeding 98 tons during any twelve consecutive month period.
[Title V Avoidance – VOC]

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- 2.2 The Permittee shall not discharge, or cause the discharge into the atmosphere, from the entire facility (except natural gas combustion and plastic injection molding process), any single hazardous air pollutant (HAP) in an amount equal to or exceeding 9.5 tons during any twelve consecutive month period, or any combination of such listed pollutants in an amount equal to or exceeding 24 tons during any twelve consecutive month period.
[Title V Avoidance – HAP]
- 2.3 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.
[391-3-1-.02(2)(b)1.]
- 2.4 The Permittee shall not cause, let, suffer, permit, or allow any emissions from any fuel burning equipment which:
- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per million BTU heat input
[391-3-1-.02(2)(d)2.(i)]
 - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity.
[391-3-1-.02(2)(d)3.]
- 2.5 The Permittee shall not discharge or cause the discharge into the atmosphere from any emission source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit:
[391-3-1-.02(2)(e)]
- a. $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour;
 - b. $E = 55 P^{0.67} - 40$; for process input weight rate in excess of 30 tons per hour.
- Where E equals the allowable particulate emission rate, in pounds per hour and P equals the process input weight rate in tons per hour.
- 2.6 The Permittee shall not burn any fuel other than natural gas in the external combustion sources at the facility.
[391-3-1-.03(2)(c); 391-3-1-.02(2)(g) (subsumed); and 40 CFR 63 Subpart JJJJJ Avoidance]
- 2.7 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]

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- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.

4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be in a form suitable for inspection or submittal to the Division and shall be maintained for a period of five (5) years from date of entry.
[391-3-1-.02(6)(b)1(i)]
- 4.2 The Permittee shall operate the RTO at all times during operation of any of the associated surface coating operations, except during maintenance or malfunction periods. The Permittee shall maintain the combustion zone temperature of the regenerative thermal oxidizer (ID No. RTO) at 1,500 degrees Fahrenheit (1,500°F) until the performance test required by Condition 6.2 is completed.

After the performance test, the Permittee shall operate RTO with the combustion zone temperature at or above the minimum temperature established during the most recent performance test.

[391-3-1-.02(6)(b)1(i)]

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- 4.3 To ensure paint booth exhaust capture, the Permittee shall ensure that all doors into the booth/flash-off area/oven enclosure are closed during operation, except for ingress and egress of personnel or material. The Permittee shall ensure that airflow around enclosure/booth openings is always directed toward the enclosure interior.
[391-3-1-.02(6)(b)1.]

5. Monitoring

- 5.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1]
- a. The Permittee shall install, calibrate, maintain, and operate a temperature indicator for the measurement of the combustion zone temperature of the regenerative thermal oxidizer (ID No. RTO). The temperature monitoring device shall have an accuracy of $\pm 2\%$ ($^{\circ}\text{F}$). Data shall be recorded continuously when the associated emission units are in operation. This data shall be used to calculate hourly averages of combustion zone temperature in RTO. The hourly averages shall be used to calculate the 3-hour rolling average.
 - b. The Permittee shall install, calibrate, maintain, and operate pressure drop indicators across each water curtain in the primer, base coat, and clearcoat booths. The pressure drop shall be monitored and recorded weekly and corrective action shall be taken within 24 hours if the pressure drop is outside the normal operating range specified by the vendor.
 - c. The Permittee shall conduct monthly inspections of the coating booths/enclosure during operation to ensure that doors are shut and that airflow across any openings is directed toward the enclosure interior and keep a record of the findings of each inspection. If any door is found open, the Permittee shall note this in the inspection log and correct the issue immediately. If airflow on any opening is not directed inside the booth/enclosure, the Permittee shall note this in the inspection log and correct the issue within 24 hours. The Permittee shall conduct a follow-up inspection of the enclosure within 12 hours after the correction and note the findings in the inspection log.

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5.2 Within 120 days after the initial startup of the facility, the Permittee shall develop and implement a Preventive Maintenance Program (PMP) for the regenerative thermal oxidizer (ID No. RTO) in order to assure that the provisions of Condition 1.1 are met. The program shall be subject to review and, if necessary, to assure compliance, modification by the Division. At a minimum, the following operation and maintenance checks shall be made on at least an annual basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:

[391-3-1-.02(6)(b)1]

- a. Clean burner.
- b. Tighten burner valve linkage.
- c. Visually inspect the combustion zone thermocouple, have thermocouple calibrated for proper operation.
- d. Visually inspect the inlet and outlet pressure sensors, have sensors calibrated for proper operation.
- e. Visually inspect crossflow for plugging on burner side. If crossflow is dirty remove and clean with hose and water.
- f. Visually inspect chamber for cracks.
- g. Visually inspect process fan rotor for warpage, cracking, abnormal noise, and free spin.

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
- b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

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- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
- 6.2 Within 180 days after initial startup of the spray coating line, the Permittee shall conduct a VOC destruction efficiency (DRE) test on the regenerative thermal oxidizer (ID No. RTO). All required continuous monitoring system(s) shall be installed, calibrated, and operating when tests are conducted. The results of the performance test(s) shall be submitted to the Division within sixty (60) days of the completion of testing. Should production rates increase above the rates at which the acceptable performance tests were made, the Division may require that the RTO be tested at a higher production rate. During the tests, the Permittee shall establish the minimum combustion zone temperature using the continuous monitoring device required by Condition 5.1a. Subsequent tests shall be conducted at approximately five-year intervals not to exceed sixty-one months between tests.
[391-3-1-.02(3)]

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall submit written notification of startup to the Division within 15 days after such date. The notification shall be submitted to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354
- 7.2 The Permittee shall maintain the following records for the RTO:
- a. Keep a log of all periods when the RTO was not operating, documenting the start and end times of those events and why the RTO was not operating. Maintain a record of the total hours each month of allowed RTO downtime.
 - b. Keep records of all 3-hour rolling average of the RTO combustion zone temperature.

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7.3 The Permittee shall maintain monthly usage records of all materials used at the facility that contain volatile organic compounds (VOC). These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the volatile content of any material disposed as waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.

[391-3-1-.02(6)(b)1.]

7.4 The Permittee shall use the monthly usage records required in Condition 7.3 and the RTO destruction efficiency from the most recent Division approved test, as applicable to materials routed to the RTO, to calculate the total monthly VOC emissions from the entire facility (except natural gas combustion and injection molding)., using the following equation:

[391-3-1-.02(6)(b)1.]

a. VOC_i (lbs) = Material use (lbs) * (%weight VOC); or

b. VOC_i (lbs) = Material used (gallons) * (VOC Content lbs/gallon); or

c. VOC_w (lbs) = Waste Material (lbs) * (%weight VOC); or

d. VOC_w (lbs) = Waste Material (gallons) * (VOC Content lbs/gallon)

e. Total VOC (lbs) = $(\sum_{i=1}^n VOC_i - \sum_{w=1}^n VOC_w)$

$ER_{VOC} = \text{Total VOC} * [\%DT + (1 - DRE) * (1 - \%DT)] / 2,000$

$\%DT = (T_{DT} / T_{DR}) * 100\%$

Where:

ER_{VOC} = Monthly VOC emission rate from the entire facility (except natural gas combustion and plastic injection molding process), in tons per month.

$\%DT$ = RTO percent down time, in percentage.

T_{DT} = Total hours per month that RTO is not operating, recorded in accordance with Condition 7.2a., or any hour during which the three-hour rolling average RTO combustion zone temperature is less than 50°F below the minimum combustion zone temperature, recorded in accordance with Condition 7.2b., in hours per month. Prior to the initial test specified in Condition 6.2, the minimum RTO combustion zone temperature is 1,500°F.

T_{DR} = Total operating hours per month that any coating booth(s) are in operation (non-cumulative).

DRE = RTO control efficiency, obtained in accordance with Condition 6.2, in percentage. Prior to the initial test specified in Condition 6.2, a DRE of 95 percent shall be used.

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2,000 = Conversion Factor to Convert Pound into Ton.

All variables used in the calculation, including any Division-approved emission factors, or control efficiencies shall be kept as part of the monthly records. The Permittee shall notify the Division in writing if the total VOC emissions from the facility (except from natural gas combustion and injection molding process) exceed 8.16 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.1.

7.5 The Permittee shall use the calculations required by Condition 7.4 to determine the total VOC emissions from the entire facility (except for natural gas combustion and injection molding process) for each twelve consecutive month period. A twelve- month total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division in writing if the total VOC emissions equal or exceed 98 tons during any twelve consecutive month period. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.

[391-3-1-.02(6)(b)1.]

7.6 The Permittee shall maintain monthly usage records of all materials used at the facility that contain one or more listed hazardous air pollutants (HAP). These records shall include the total weight of each material used and the amount of each listed HAP contained in each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the individual HAP content of any material disposed as waste provided that the total weight, the individual HAP content (expressed as a weight percentage), and documentation of the method for determining the individual HAP content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.

[391-3-1-.02(6)(b)1.]

7.7 The Permittee shall use the calculations required by Condition 7.6 to determine the total hazardous air pollutant emissions from the entire facility (except natural gas combustion and injection molding) for each twelve consecutive month period, using the following equation:

[391-3-1-.02(6)(b)1.]

a. HAP_i (lbs) = Material use (lbs) * (%weight HAP); or

b. HAP_i (lbs) = Material used (gallons) * (HAP Content lbs/gallon); or

c. HAP_w (lbs) = Waste Material (lbs) * (%weight HAP); or

d. HAP_w (lbs) = Waste Material (gallons) * (HAP Content lbs/gallon)

e. Total Individual HAP (lbs) = $(\sum_{i=1}^n HAP_i - \sum_{w=1}^n HAP_w)$

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$$ER_{HAP} = \text{Total Individual HAP} * [\%DT + (1 - DRE) * (1 - \%DT)] / 2,000$$

$$\%DT = (T_{DT} / T_{DR}) * 100\%$$

Where:

- ER_{HAP} = Monthly Individual HAP emission rate from the entire facility (except natural gas combustion and plastic injection molding process), in tons per month.
- $\%DT$ = RTO percent down time, in percentage.
- T_{DT} = Total hours per month that RTO is not operating, recorded in accordance with Condition 7.2a., or any hour during which the three-hour rolling average RTO combustion zone temperature is less than 50°F below the minimum combustion zone temperature, recorded in accordance with Condition 7.2b., in hours per month. Prior to the initial test specified in Condition 6.2, the minimum RTO combustion zone temperature is 1,500°F.
- T_{DR} = Total operating hours per month that any coating booth(s) are in operation (non-cumulative).
- DRE = RTO control efficiency, obtained in accordance with Condition 6.2, in percentage. Prior to the initial test specified in Condition 6.2, a DRE of 95 percent shall be used.
- 2,000 = Conversion Factor to Convert Pound into Ton.

All variables used in the calculation, including any Division-approved emission factors, or control efficiencies shall be kept as part of the monthly records. The Permittee shall notify the Division in writing if the emissions of any individual hazardous air pollutant exceed 0.79 tons, (or one-twelfth of any lesser quantity for a single hazardous air pollutant that the U.S. EPA may establish by rule), or if emissions of all listed hazardous air pollutants combined exceed 2.0 tons, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 2.2.

- 7.8 The Permittee shall use the calculations required by Condition 7.7 to determine the total hazardous air pollutant emissions from the entire facility (except natural gas combustion and injection molding) for each twelve consecutive month period. The Permittee shall notify the Division in writing if, during any twelve consecutive month period, the emissions of any individual hazardous air pollutant equal or exceed 9.5 tons, or if the emissions of all listed hazardous air pollutants combined equal or exceed 24 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.2. [391-3-1-.02(6)(b)1.]

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8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."